

**Air Pollution Control District
Jefferson County, Ky
28 August 2000**

TITLE V PERMIT SUMMARY

Company: Eckart Aluminum L.P.

Plant Location: 4101 Campground Road, Louisville, Kentucky 40211

Date App. Received: 21 April 1994

Date Admin. Complete: 13 June 1995

Date of Draft Permit:

Date of Proposed Permit:

District Engineer: Stephen Taylor

Permit #: 143-97-TV

Plant ID: 0187

SIC Code: 3399

NAICS: 331314

AFS: 00187

Introduction:

This permit is to be issued according to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide practical methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), particulate matter less than 10 microns (PM₁₀), and lead (Pb); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}); and is a moderate non-attainment area for ozone (O₃).

Application Type/Permit Activity:

- ☒ Initial Issuance
- ☐ Permit Revision
 - ☐ Administrative
 - ☐ Minor
 - ☐ Significant
- ☐ Permit Renewal

Compliance Summary:

- ☒ Compliance certification signed
- ☐ Compliance schedule included
- ☐ Source is out of compliance

I. Source Description

1. **Class I Area Impacts:** This source is not located in or near a Class I area.
2. **Product Description:** Aluminum powder and paste
3. **Overall Process Description:** Producing aluminum powder and paste
4. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**
 - a. **U1:** Boiler Room
 - b. **U2:** Hot Air Furnace
 - c. **U3:** Hot Air Direct Convey and Air Slide System
 - d. **U4:** Hot Air Bin Fill
 - e. **U5:** Cold Air Furnace
 - f. **U6:** Classifier
 - g. **U7:** Blender
 - h. **U8:** Rescreens
 - i. **U10:** MMC Process (billet manufacturing)
 - j. **U12:** Aluminum Grinding and Storage
 - k. **U13:** Aluminum Paste Process
 - l. **U14:** Aluminum Paste Dryers
 - m. **U15:** Mixers
 - n. **U16:** AST (Aboveground Storage Tank) Farm
 - o. **U17:** Stills
 - p. **U18:** Nonhalogenated Cold Solvent Metal Cleaners
 - q. **U19:** Soil Vapor Extraction System
 - r. **U20:** Drum Washer
6. **Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy) 1999 Data	Major Source Status
CO	2.20	No
NO _x	14.60	No
SO ₂	Negligible	No
PM	74.69	Yes
VOC	82.19	Yes
Single HAP >1 tpy	none	No
Total HAPs	1.06	No

7. **Fugitive Sources:** None

8. **Applicable Requirements:**

<input type="checkbox"/> PSD	<input checked="" type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> Other
<input type="checkbox"/> NSR	<input type="checkbox"/> NESHAPS	<input checked="" type="checkbox"/> District-Origin	<input type="checkbox"/> MACT

9. **Referenced Federal Regulations in Permit:** None

II. Regulatory Analysis

1. **Emission and Operating Caps:** The source is not subject to any plant-wide emission or operating caps.

2. **Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.

3. **Operational Flexibility:** The source did not request to operate under alternative operating scenarios in its Title V Permit Application.

4. **Testing Requirements:** Method 9 testing shall be performed at various emission points, when monitoring requires. Methods 1 through 5 shall be performed on Emission Unit U2 during the third year of the permit. Method 25 shall be performed on Emission Units U13 and U14.

5. **Monitoring, Recordkeeping and Reporting Requirements:** The source is required to monitor, maintain records of, and report on various operating parameters to demonstrate ongoing compliance with all applicable requirements. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting. The source shall monitor the following:

a. **Opacity:** For emission units U1-U8,U10 and U12, the monthly visible emissions surveys are adequate for periodic monitoring to demonstrate compliance with the opacity standard. The source is required to perform a Method 9 at points where visible emissions are observed. The periodic surveys coupled with Method 9 tests, if necessary, are adequate to demonstrate compliance with the opacity standards.

b. **Particulate Matter:** For emission unit U1, the potential uncontrolled PM emissions, using the applicable AP-42 emission factors, demonstrate that the PM emission standards specified in District Regulation 7.06 cannot be exceeded when combusting either natural gas or #2 fuel oil; therefore, no periodic monitoring is required. For emission units U2-U8,U10 and U12, the records, that show production rates and hours of operation, and the periodic stack tests are adequate to demonstrate compliance with the PM emission standards.

- c. **Sulfur Dioxide:** For emission unit U1, the potential uncontrolled SO₂ emissions, using the applicable AP-42 emission factors, demonstrate that the SO₂ emission standards specified in District Regulation 7.06 cannot be exceeded when combusting either natural gas or #2 fuel oil; therefore, no periodic monitoring is required.
- d. **Volatile Organic Compounds:** For emission units U13-U15, U17-U20, the records, that show production rates and hours of operation, and the periodic stack tests, are adequate to demonstrate compliance with the VOC emission standards.

6. Off-Permit Documents: None

The District considers an “off-permit document” as a document on which a source’s compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source’s Title V Operating Permit. The designation “off-permit document” shall be made at the District’s discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, Preventative Maintenance Program (PMP), Management Of Change System (MOCS); or other documents which are too voluminous to place in the permit.

III. Other Requirements

- 1. **Temporary Facilities:** The source did not request to operate any temporary facilities.
- 2. **Short Term Activities:** The source did not report any short term activities.
- 3. **Compliance Schedule/Progress Reports:** The source certified compliance with all applicable requirements; therefore, no compliance schedule or progress reports are necessary.
- 4. **Emissions Trading:** None
- 5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
- 6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not use any of the listed chemicals.
- 7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed

in 40 CFR 68 Subpart F and Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.

- 8. Insignificant Activities:** The following activities, as referenced in the company's Title V permit application, have been determined by the District to be insignificant.

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
AST #8 #2 Fuel Oil storage tank (E108) (1000 gal)	1	Reg 2.02, sec 2.3.9.2
Research and Development Activities	2	Reg 2.02, sec 2.3.27
Brazing, soldering or welding equipment	Various	Reg 2.02, sec 2.3.4
Lab ventilating and exhaust systems	Various	Reg 2.02, sec 2.3.11

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- B. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- i. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
 - ii. No periodic monitoring shall be required for facilities designated as insignificant activities.